

Attachment B

From: [Cooper Strickland](#)
To: [Wolfson Young, Danielle \(CIV\)](#)
Cc: [Canevari, Dorothy M. \(CIV\)](#); [Kolsky, Joshua \(CIV\)](#); [McMahon, Madeline M \(CIV\)](#)
Subject: Re: [EXTERNAL] Re: Trial preparations
Date: Friday, November 17, 2023 3:55:42 PM

Dear Ms. Young,

I am not available Tuesday afternoon, but I will arrange time for a call on Wednesday afternoon. Please let me know what time works best for you.

Thank You,

Cooper

On Fri, Nov 17, 2023 at 11:20 AM Wolfson Young, Danielle (CIV)
<Danielle.Young2@usdoj.gov> wrote:

Mr. Strickland,

Thanks for your email. Given that the Court has instructed that the parties' final exhibits be sent to him in binders no later than December 1, we need to schedule a time to meet and confer now. You can continue to review the materials in advance of that meeting. Are you available to meet and confer on Tuesday, November 21st at 2 pm? Please let me know as soon as possible, and I will arrange a conference call line.

Thanks,

Danielle

From: Cooper Strickland <cooper.strickland@gmail.com>
Sent: Friday, November 17, 2023 10:57 AM
To: Wolfson Young, Danielle (CIV) <Danielle.Young2@usdoj.gov>
Cc: Canevari, Dorothy M. (CIV) <Dorothy.M.Canevari@usdoj.gov>; Kolsky, Joshua (CIV) <Joshua.kolsky@usdoj.gov>; McMahon, Madeline M (CIV) <Madeline.M.McMahon@usdoj.gov>
Subject: Re: [EXTERNAL] Re: Trial preparations

Dear Ms. Young,

Thank you for your email. I am reviewing the documents you provided and will respond as soon as possible regarding the issues you have identified as we work to complete the conferral process prior to trial.

Cooper

On Tue, Nov 14, 2023 at 1:38 PM Wolfson Young, Danielle (CIV)
<Danielle.Young2@usdoj.gov> wrote:

Mr. Strickland,

Please find attached Defendants' letter and accompanying attachment. We look forward to meeting and conferring with you on these issues soon.

Best,

Danielle

From: Wolfson Young, Danielle (CIV)
Sent: Friday, October 27, 2023 12:31 PM
To: Cooper Strickland <cooper.strickland@gmail.com>
Cc: Canevari, Dorothy M. (CIV) <Dorothy.M.Canevari@usdoj.gov>; Kolsky, Joshua (CIV) <Joshua.kolsky@usdoj.gov>; McMahon, Madeline M (CIV) <Madeline.M.McMahon@usdoj.gov>
Subject: RE: [EXTERNAL] Re: Trial preparations

Mr. Strickland,

Thank you for your email. Defendants continue to believe that the parties should begin the meet and confer process as soon as possible both to ensure that we have adequate time to meet and confer and to comply with Judge Young's orders on this topic. As you know, the trial is only six weeks away, so we do not see any reason to delay initiating the meet and confer process until after the pretrial conference. On the contrary, it makes good sense to confer before the pretrial conference so that we can hopefully resolve or narrow the parties' disagreements, which will allow for a more productive conference with the

Court. Please let us know if you'd be willing to reconsider your position.

We understand that Plaintiff thinks it is premature to contact chambers about the trial location, however, given that trial is only six weeks away, we need to book hotel reservations wherever Judge Young has reserved a courtroom. It is not clear to Defendants whether the trial is set to be in Asheville or in Charlotte. *See* ECF No. 286 at 1 (order setting trial for approximately December 11 without specifying a location). Accordingly, we will contact Ms. Gaudet later today and copy you on the email.

Best,

Danielle

From: Cooper Strickland <cooper.strickland@gmail.com>
Sent: Thursday, October 26, 2023 4:45 PM
To: Wolfson Young, Danielle (CIV) <Danielle.Young2@usdoj.gov>
Cc: Canevari, Dorothy M. (CIV) <Dorothy.M.Canevari@usdoj.gov>; Kolsky, Joshua (CIV) <Joshua.kolsky@usdoj.gov>; McMahon, Madeline M (CIV) <Madeline.M.McMahon@usdoj.gov>
Subject: [EXTERNAL] Re: Trial preparations

Dear Ms. Young,

Thank you for your email. Plaintiff agrees that the Court “instructed [counsel] to meet and confer to create a single exhibit list with agreed to exhibits given numbers and any objected to exhibits given letters (A-Z, AA, AB, AC etc.)” Entry Order Dated September 19, 2023. It is my understanding, however, that other than the actual trial date there is no deadline to complete this task because the Court stated that we have to “sit down together sometime before trial, I don’t care when you do it, and it need not be done until we’re right up against trial.” ECF No. 262, at 12; *see also* ECF No. 274, at 1–2 n.1. With that understanding and because the Court has set a further pretrial conference, Plaintiff’s position is that any meet and confer regarding the exhibit list should occur after that conference.

Plaintiff also believes it is premature to contact chambers regarding the trial location prior to the further pretrial conference and takes at face value the Court’s prior statements that it “will know . . . well before the [trial date] and Ms. Gaudet will inform you at once [of the trial location].” ECF No. 262, at 24.

Thank You,

Cooper

On Wed, Oct 25, 2023 at 3:50 PM Cooper Strickland <cooper.strickland@gmail.com> wrote:

Dear Ms. Young,

Thank you for your email. Plaintiff is considering the issues you raised and intends to provide a response no later than tomorrow.

Thank You,

Cooper

On Tue, Oct 24, 2023 at 1:57 PM Wolfson Young, Danielle (CIV) <Danielle.Young2@usdoj.gov> wrote:

Mr. Strickland,

As you are aware, it is Defendants' understanding that the Court expects the parties to meet and confer about factual stipulations, trial exhibits, and deposition designations. Accordingly, we are reaching out to propose a call to discuss these topics prior to the pretrial conference. Please let us know your availability next week for a call.

Additionally, Defendants would like to reach out to Judge Young's deputy to ask the location of the December 11 trial. Please let us know if Plaintiff has any objection. We will copy you on our email to Ms. Gaudet.

Best,

Danielle